

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

WINARD CONSTRUCTION  
& DEVELOPMENT, INC.

Plaintiff,

v.

TIMOTHY HARRINGTON,

Defendant.

Civil Action No. 04-10915-GAO

**JOINT MOTION TO EXTEND SCHEDULING ORDER DEADLINES**

The parties in the above-captioned matter hereby jointly move to extend the deadline for completing discovery contained in the current Scheduling Order from March 1, 2005 to August 1, 2005. In support of the Joint Motion to Extend Scheduling Order Deadlines, the parties state that while discovery has proceeded promptly thus far, they require additional time to complete discovery and all pre-trial matters. The limited extension as requested will permit the parties to complete all pre-trial matters in an orderly fashion and without prejudice to any party.

With the requested extension, the parties propose the following schedule:

Close of all Fact Discovery:	August 1, 2005
Rule 26(a)(2)(B) Expert Disclosures Due	August 15, 2005
Rule 26(a)(2)(C) Expert Disclosures Due	September 15, 2005
Close of Expert Discovery	October 31, 2005
Dispositive Motions Filed	November 30, 2005
Final Pre-Trial Conference	January, 2006

For the foregoing reasons, the parties respectfully request this Court to extend the Scheduling Order consistent with the deadlines set forth above.

Respectfully Submitted,

TIMOTHY HARRINGTON,

By his attorney,



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Respectfully Submitted,

WINARD CONSTRUCTION AND  
DEVELOPMENT, INC.

By its attorney,



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Dated: March 15, 2005